

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRANK QUAGLIA,

Plaintiff,

v.

BRAVO NETWORK, NATIONAL BROADCASTING
COMPANY, INC., RAINBOW PROGRAMMING
HOLDINGS, INC. AND DOES 1-10,

Defendants.

CIVIL ACTION
NO. 04-10460-GAO

UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE A RESPONSIVE PLEADING

Defendants Bravo Network, National Broadcasting Company, Inc. and Rainbow Media Holdings LLC (sued herein as Rainbow Programming Holdings, Inc.) (collectively, "defendants") hereby move for an extension of time until April 30, 2004 within which to file a responsive pleading to plaintiff's complaint. As grounds for their motion, defendants state as follows:

1. Plaintiff's complaint in this action was filed on March 9, 2004. Defendants were served with the complaint on March 18, March 25, and April 1, 2004 respectively.

2. Defendants seek an extension of time until April 30, 2004 within which to respond to the complaint in order to properly investigate the facts alleged and legal issues raised by plaintiff's complaint.

3. Plaintiff's counsel has assented to the relief sought in this motion.

WHEREFORE, defendants respectfully requests that the Court:


(1) ALLOW this Unopposed Motion to Extend Time to File a Responsive Pleading; and

(2) enter an Order extending, up to and including April 30, 2004, the time within which defendants must file a responsive pleading to plaintiff's complaint

Respectfully submitted,

BRAVO NETWORK, NATIONAL BROADCASTING
COMPANY, INC., and RAINBOW MEDIA HOLDINGS
LLC (sued herein as RAINBOW PROGRAMMING
HOLDINGS, INC.)

By their attorneys,


Jonathan M. Albano, BBO #013850
BINGHAM DANA LLP
150 Federal Street
Boston, MA 02110
(617) 951-8000

Of Counsel
Daniel M. Kummer
National Broadcasting Company, Inc.
30 Rockefeller Plaza
New York, NY 10112
(212) 664-6572

Dated: April 14, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorneys of record for each other party by facsimile and first-class mail on April 14, 2004.


Jonathan M. Albano